

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF VIRGINIA  
Richmond Division**

In re:

LeClairRyan, PLLC,<sup>1</sup>

Debtor

Case No. 19-34574-KRH

Chapter 7

**PROPOSED AGENDA FOR HEARING ON  
AUGUST 25, 2022, AT 1:00 P.M. (PREVAILING EASTERN TIME)**

Set forth below are the matters scheduled to be heard before the Honorable Kevin R. Huennekens on August 25, 2022, beginning at 1:00 p.m. The omnibus hearing shall be conducted via Zoom for Government. Persons wishing to appear at the omnibus hearing may participate by registering in advance at:

<https://www.zoomgov.com/meeting/register/vJlscu2oqDwsGI3MjKXR1eCLyXqMfJ-fyig>

Persons who wish to attend, but not participate at, the omnibus hearing may dial-in to the Court's listen-only conference line:

Dial: 1-866-590-5055, Access Code: 4377075, Security Code: 82522

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<sup>1</sup> The principal address of the Debtor as of the petition date was 4405 Cox Road, Glen Allen, Virginia 23060, and the last four digits of the Debtor's federal tax identification number are 2451.

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Paula S. Beran, Esquire (Va. Bar No. 34679)  
Tavener & Beran, PLC  
20 North Eighth Street, Second Floor  
Richmond, Virginia 23219  
Telephone: (804) 783-8300  
Telecopy: (804) 783-0178

*Counsel for Lynn L. Tavener, Chapter 7 Trustee*

**I. MATTERS OF THE TRUSTEE AND/OR THE ESTATE**

1. Motion to Approve Compromise under FRBP 9019 (Iron Mountain) filed by Paula S. Beran of Tavenner & Beran, PLC on behalf of Lynn L. Tavenner [ECF No. 1424] Related documents:
  - a. Notice of Motion and Notice of Hearing (Re: related document(s)[1424] Motion to Approve filed by Lynn L. Tavenner) filed by Paula S. Beran of Tavenner & Beran, PLC on behalf of Lynn L. Tavenner. Hearing scheduled for 7/14/2022 at 02:00 PM at Judge Huennekens' Courtroom, 701 E. Broad St., Rm. 5000, Richmond, Virginia. [ECF No.1425]
  - b. Exhibit - Schedule A (Re: related document(s)[1424] Motion to Approve filed by Lynn L. Tavenner, [1425] Notice of Motion and Notice of Hearing filed by Lynn L. Tavenner, [1532] Application to Employ filed by Lynn L. Tavenner, [1533] Application to Employ filed by Lynn L. Tavenner, [1536] Notice of Motion and Notice of Hearing filed by Lynn L. Tavenner) filed by Paula S. Beran of Tavenner & Beran, PLC on behalf of Lynn L. Tavenner. [ECF No. 1554]
  - c. Declaration of *Lynn L. Tavenner, Chapter 7 Trustee* [ECF 1485]
  - d. Hearing held and continued; Declaration of Lynn L. Tavenner, entry 1485 Admitted. Appearance(s): Paula Beran for Trustee (Re: related document(s)1424 Motion to Approve filed by Lynn L. Tavenner) Hearing scheduled for 7/19/2022 at 12:00 PM at Judge Huennekens' Courtroom, 701 E. Broad St., Rm. 5000, Richmond, Virginia. [ECF No. 1491]
  - e. Notice of Continued Hearing (*NOTICE OF (1) CONTINUATION OF HEARING ON MOTION AND (2) CANCELLATION OF HEARING SCHEDULED FOR JULY 19, 2022 AT NOON*) (Re: related document(s) 1491 Hearing continued) filed by Paula S. Beran of Tavenner & Beran, PLC on behalf of Lynn L. Tavenner. Hearing scheduled for 8/25/2022 at 01:00 PM at Judge Huennekens' Courtroom, 701 E. Broad St., Rm. 5000, Richmond, Virginia. [ECF No. 1497]

Response Deadline: July 7, 2022

Responses Filed: None

Status: The Trustee will request that the Court grant the Motion as filed.

2. Trustee's Application to Retain and Employ Cozen O'Connor as Special Counsel filed by Paula S. Beran of Tavenner & Beran, PLC on behalf of Lynn L. Tavenner [ECF No. 1532]

Related documents:

- a. Notice of Motion and Notice of Hearing (Re: related document(s)[1532](#) Application to Employ filed by Lynn L. Tavenner, [1533](#) Application to Employ filed by Lynn L. Tavenner, [1535](#) Motion to Expedite Hearing filed by Lynn L. Tavenner) filed by Paula S. Beran of Tavenner & Beran, PLC on behalf of Lynn L. Tavenner. Hearing scheduled for 8/4/2022 at 09:00 AM at Judge Huennekens' Courtroom, 701 E. Broad St., Rm. 5000, Richmond, Virginia. [ECF No. 1536]
- b. Exhibit - Schedule A (Re: related document(s)[1424] Motion to Approve filed by Lynn L. Tavenner, [1425] Notice of Motion and Notice of Hearing filed by Lynn L. Tavenner, [1532] Application to Employ filed by Lynn L. Tavenner, [1533] Application to Employ filed by Lynn L. Tavenner, [1536] Notice of Motion and Notice of Hearing filed by Lynn L. Tavenner) filed by Paula S. Beran of Tavenner & Beran, PLC on behalf of Lynn L. Tavenner. [ECF No. 1554]
- c. Notice of Continued Hearing (*NOTICE OF (1) CONTINUATION OF HEARING ON APPLICATIONS AND (2) CANCELLATION OF HEARING SCHEDULED FOR AUGUST 15, 2022 AT 10:00 AM*) (Re: related document(s) 1539 Hearing continued) filed by Paula S. Beran of Tavenner & Beran, PLC on behalf of Lynn L. Tavenner. Hearing scheduled for 8/25/2022 at 01:00 PM at Judge Huennekens' Courtroom, 701 E. Broad St., Rm. 5000, Richmond, Virginia. [ECF No. 1542]
- d. Stipulation By Lynn L. Tavenner and Between John P. Fitzgerald, III, Acting United States Trustee for Region Four filed by Paula S. Beran of Tavenner & Beran, PLC on behalf of Lynn L. Tavenner. [ECF No. 1543]
- e. Interim Order Granting Application to Employ Cozen O'Connor as Special Counsel (Related Doc # [1532](#)) [ECF No. 1548]

Response Deadline: August 11, 2022 and August 22, 2022

Responses Filed: None

Status: The Trustee will request that the Court grant the Application as modified pursuant to the proposed order attached hereto as Exhibit A.

3. *Trustee's Supplement to Application to Retain and Employ Quinn Emanuel Urquhart & Sullivan, LLP as Special Counsel to the Chapter 7 Trustee/Estate* (Related Document(s)[908](#) Application to Employ filed by Lynn L. Tavenner) filed by Paula S. Beran of Tavenner & Beran, PLC on behalf of Lynn L. Tavenner [ECF No. 1533]

Related documents:

- a. Notice of Motion and Notice of Hearing (Re: related document(s) [1532](#) Application to Employ filed by Lynn L. Tavenner, [1533](#) Application to Employ filed by Lynn L. Tavenner, [1535](#) Motion to Expedite Hearing filed by Lynn L. Tavenner) filed by Paula S. Beran of Tavenner & Beran, PLC on behalf of Lynn L. Tavenner. Hearing scheduled for 8/4/2022 at 09:00 AM at Judge Huennekens' Courtroom, 701 E. Broad St., Rm. 5000, Richmond, Virginia. [ECF No. 1536]
- b. Exhibit - Schedule A (Re: related document(s) [1424] Motion to Approve filed by Lynn L. Tavenner, [1425] Notice of Motion and Notice of Hearing filed by Lynn L. Tavenner, [1532] Application to Employ filed by Lynn L. Tavenner, [1533] Application to Employ filed by Lynn L. Tavenner, [1536] Notice of Motion and Notice of Hearing filed by Lynn L. Tavenner) filed by Paula S. Beran of Tavenner & Beran, PLC on behalf of Lynn L. Tavenner. [ECF No. 1554]
- c. Notice of Continued Hearing (*NOTICE OF (1) CONTINUATION OF HEARING ON APPLICATIONS AND (2) CANCELLATION OF HEARING SCHEDULED FOR AUGUST 15, 2022 AT 10:00 AM*) (Re: related document(s) 1539 Hearing continued) filed by Paula S. Beran of Tavenner & Beran, PLC on behalf of Lynn L. Tavenner. Hearing scheduled for 8/25/2022 at 01:00 PM at Judge Huennekens' Courtroom, 701 E. Broad St., Rm. 5000, Richmond, Virginia. [ECF No. 1542]
- d. Stipulation By Lynn L. Tavenner and Between John P. Fitzgerald, III, Acting United States Trustee for Region Four filed by Paula S. Beran of Tavenner & Beran, PLC on behalf of Lynn L. Tavenner [ECF No. 1543]
- e. Interim Order Granting Application to Employ Quinn Emanuel Urquhart & Sullivan, LLP as Special Counsel. (Related Doc # [1533](#)) [ECF No. 1549]

Response Deadline: August 11, 2022 and August 22, 2022

Responses Filed: None

Status: The Trustee will request that the Court address the Application as provided in the proposed order attached hereto as Exhibit B.

4. Adversary Proceeding No. 21-03062 (Curran) – Notice of Rescheduled Pre-Trial Conference filed by Paula S. Beran of Tavenner & Beran, PLC on behalf of Lynn L. Tavenner, as Chapter 7 Trustee. Pre-Trial Conference set for 8/25/2022 at 01:00 PM at

Judge Huennekens' Courtroom, 701 E. Broad St., Rm. 5000, Richmond, Virginia [ECF No. 20]

Status: The Trustee will request that the Court enter its standard pretrial order providing for a one and a half-day trial during the time period that this Court deems appropriate, which the Trustee respectfully submits could be as early as December 1, 2022. The Trustee understands that the Defendant will request the entry of a different pretrial order providing for a seven-day trial sometime in 2023.

## **II. MATTERS OF THIRD PARTIES**

5. Application for Administrative Expenses filed by Lori D. Thompson of Spilman, Thomas Battle PLLC on behalf of Lori D. Thompson. (Attachments: # 1 Exhibit(s) A) [ECF No. 1360]

Related documents:

- a. Notice of Motion and Notice of Hearing (Re: related document(s)1360 Application for Administrative Expenses filed by Lori D. Thompson) filed by Lori D. Thompson of Spilman, Thomas Battle PLLC on behalf of Lori D. Thompson. Hearing scheduled for 6/28/2022 at 11:00 AM at Judge Huennekens' Courtroom, 701 E. Broad St., Rm. 5000, Richmond, Virginia. [ECF No. 1361]
- b. Hearing held and continued; Appearance(s): Paula Beran for Trustee (Re: related document(s)1360 Application for Administrative Expenses filed by Lori D. Thompson) Hearing scheduled for 7/14/2022 at 02:00 PM at Judge Huennekens' Courtroom, 701 E. Broad St., Rm. 5000, Richmond, Virginia. Modified on 7/1/2022 to correct hearing time to 2:00 PM [ECF No. 1448]
- c. Hearing held and continued; Appearance(s): Paula Beran for Trustee (Re: related document(s)1360 Application for Administrative Expenses filed by Lori D. Thompson) Hearing scheduled for 8/25/2022 at 01:00 PM at Judge Huennekens' Courtroom, 701 E. Broad St., Rm. 5000, Richmond, Virginia. [ECF No. 1492]

Response Deadline: June 21, 2022

Responses Filed: Response to (Re: related document(s)1360 Application for Administrative Expenses filed by Lori D. Thompson) filed by Paula S. Beran of Tavenner & Beran, PLC on behalf of Lynn L. Tavenner. [ECF No. 1420]

Status: The Movant and the Trustee have resolved this matter as well as all other matters related to this Movant. As such, this matter may be removed from the Court's docket.

### III. REPORTS

6. Case Status and Report pursuant to Local Rule 2015-(a)-(1)(A)

Respectfully submitted,

**LYNN L. TAVENNER, CHAPTER 7 TRUSTEE**

Dated: August 23, 2022  
Richmond, Virginia

By: /s/ Paula S. Beran  
Paula S. Beran, Esquire (VSB No. 34679)  
PBeran@TB-LawFirm.com  
Tavener & Beran, PLC  
20 North 8<sup>th</sup> Street  
Richmond, Virginia 23219  
Telephone: (804) 783-8300  
Telecopier: (804) 783-0178

*Counsel for Lynn L. Tavenner, Chapter 7 Trustee*

### **CERTIFICATE OF SERVICE**

Pursuant to the Local Rules of this Court and applicable orders, I certify that on this 23rd day of August, 2022, a true copy of the foregoing Agenda was sent electronically to all parties receiving ECF notices in this Case.

/s/ Paula S. Beran  
*Counsel for Lynn L. Tavenner, Chapter 7 Trustee*

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF VIRGINIA  
Richmond Division

In re:

LeClairRyan, PLLC,<sup>1</sup>

Debtor

Case No.

19-34574-KRH

Chapter

7

**ORDER AUTHORIZING THE RETENTION AND EMPLOYMENT  
OF COZEN O'CONNOR AS SPECIAL COUNSEL**

This matter came before the Court upon the Trustee's Application to Retain and Employ Cozen O'Connor as Special Counsel (the "**Application**") [ECF 1532]. The Court having reviewed (i) the Application and (ii) Verified Statement of Brian L. Shaw pursuant to Fed. R. Bankr. P. 2014(a) (the "**Shaw Statement**"), a member of the law firm of Cozen O'Connor ("**Cozen O'Connor**"), attached to the Application as Exhibit 1; and the Court being fully advised in the premises and having determined that the legal and factual bases set forth in the Application and the Shaw Statement establish just cause for the relief granted herein;

THE COURT HEREBY FINDS THAT:

- A. The Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334.
- B. This is a core proceeding pursuant to 28 U.S.C. § 157(b)(2).

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<sup>1</sup> The principal address of the Debtor as of the petition date was 4405 Cox Road, Glen Allen, Virginia 23060, and the last four digits of the Debtor's federal tax identification number are 2451.

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Paula S. Beran, Esquire (Va. Bar No. 34679)  
Tavener & Beran, PLC  
20 North Eighth Street, Second Floor  
Richmond, Virginia 23219  
Telephone: (804) 783-8300  
Telecopy: (804) 783-0178  
*Counsel for Lynn L. Tavener, Chapter 7 Trustee*

- C. Notice of the Application was sufficient under the circumstances.
- D. The Application and the Shaw Statement are in full compliance with all applicable provisions of the Bankruptcy Code, the Bankruptcy Rules, and the Local Rules of this Court.
- E. Cozen O'Connor does not represent or hold any interest adverse to the Debtor or to the Estate.
- F. Cozen O'Connor is a "disinterested person," as defined in § 101(14) of the Bankruptcy Code.
- G. Cozen O'Connor does not represent or hold any interest adverse to the Debtor or to the Estate with respect to matters to which it is being employed.
- H. The retention and employment of Cozen O'Connor in accordance with the Application and this Order is in the best interest of the Estate.

IT IS HEREBY ORDERED THAT:

- 1. The Application is hereby APPROVED as provided herein.
- 2. Capitalized terms not otherwise defined herein shall have the meanings given to them in the Application.
- 3. Pursuant to § 327 of the Bankruptcy Code and the Application, the Trustee is authorized to retain and employ Cozen O'Connor as special counsel retroactive to July 28, 2022. Pursuant to § 327(a) and (e) of the Bankruptcy Code, the Trustee is authorized to employ Cozen O'Connor, on an hourly basis at agreed to rates, including reimbursement of reasonable related costs and expenses, in connection with appellate matters including the Judicially Mediated Global Settlement Appeal and related matters.
- 4. Cozen O'Connor shall not receive any type of retainer.
- 5. Approval of Cozen O'Connor's fees shall be subject to further order of the Court.



6. This Court shall retain exclusive jurisdiction over the Application as well as all matters related thereto.

Entered:

\_\_\_\_\_  
UNITED STATES BANKRUPTCY JUDGE

I ask for this:

/s/ Paula S. Beran

Paula S. Beran, Esquire (VSB No. 34679)  
Tavener & Beran, PLC  
20 North 8<sup>th</sup> Street, Second Floor  
Richmond, Virginia 23219  
Telephone: (804) 783-8300  
Facsimile: (804) 783-0178

*Counsel for Lynn L. Tavenner, Chapter 7 Trustee*

Seen and not objected to:

/s/ Kathryn R. Montgomery

Kathryn R. Montgomery, Esquire  
Shannon F. Pecoraro, Esquire  
Office of the United States Trustee  
701 East Broad Street, Suite 4304  
Richmond, Virginia 23219  
(804) 771-8004

*Office of the United States Trustee*

**CERTIFICATION**

I hereby certify under Local Rule 9022-1 that the foregoing proposed Order was served on all requisite parties and has been endorsed by all necessary parties.

/s/

\_\_\_\_\_  
Paula S. Beran, Esquire

EXHIBIT B

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF VIRGINIA  
Richmond Division

In re:

LeClairRyan, PLLC,<sup>1</sup>

Debtor

Case No.

19-34574-KRH

Chapter

7

**ORDER CLARIFYING THE ORDER AUTHORIZING  
THE RETENTION AND EMPLOYMENT OF QUINN  
EMANUEL URQUHART & SULLIVAN, LLP AS SPECIAL COUNSEL**

This matter came before the Court upon the Trustee’s Supplement to Application to Retain and Employ Quinn Emanuel Urquhart & Sullivan, LLP as Special Counsel (the “**Supplemental Application**”)[ECF 1533]. The Court having reviewed (i) the Supplemental Application, (ii) the Quinn Retention Application,<sup>2</sup> (iii) Verified Statement (and its supplement) of Erika Morabito pursuant to Fed. R. Bankr. P. 2014(a) (collectively, the “**Morabito Statement**”), a partner in the law firm of Quinn Emanuel Urquhart & Sullivan, LLP (“Quinn Emanuel”), (iv) the Declaration of Lynn L. Tavenner, Chapter 7 Trustee (the “**Tavenner Declaration**”); and the Court having entered the Interim Order Authorizing the Supplemental Retention and Employment of Quinn Emanuel Urquhart & Sullivan, LLP as Special Counsel (the “**Interim Order**”) [ECF 1549], and being fully advised of the premise and having determined that the legal and factual basis set forth in the

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<sup>1</sup> The principal address of the Debtor as of the petition date was 4405 Cox Road, Glen Allen, Virginia 23060, and the last four digits of the Debtor’s federal tax identification number are 2451.

<sup>2</sup> Capitalized terms not otherwise defined herein shall have the meanings given to them in the Supplemental Application.

Supplemental Application, the Quinn Retention Application, the Morabito Statement, and the Tavenner Declaration establish just cause for the relief granted herein.

THE COURT HEREBY FINDS THAT:

A. The Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334.

B. This is a core proceeding pursuant to 28 U.S.C. § 157(b)(2).

C. Notice of the Supplemental Application was sufficient under the circumstances.

D. The continued retention and employment of Quinn Emanuel in accordance with this Order is in the best interest of the Estate.

E. As a result of the entry by the United States District Court of the Eastern District of Virginia on August 8, 2022 of various orders dismissing the Judicially Mediated Global Settlement Appeal and the Premature Seal Appeal, the Supplemental Representation is no longer necessary in so far as this Order addresses all necessary items to be made *nunc pro tunc* to July 11, 2022 to the Order Authorizing the Retention and Employment of Quinn Emanuel Urquhart & Sullivan LLP as Special Counsel entered on June 28, 2021 (the “**Quinn Retention Order**”) [ECF 937].

F. The work that the Trustee requested in writing for Quinn Emanuel to undertake, as described in paragraph 23 of the Supplemental Application, to protect and preserve value for the Estate while the Trustee conducted extensive due diligence on what was in the Estate’s best interest to address the Judicially Mediated Global Settlement Appeal (the “**Preservation Services**”) constitutes a Non-Contingency Matter for which Quinn Emanuel is entitled pursuant to the Quinn Retention Order to charge its standard hourly rates, subject to a ten (10) percent discount.

G. This Order shall constitute the final order referenced in the Interim Order. IT IS HEREBY ORDERED THAT:

1. The Quinn Retention Order is clarified as set forth herein *nunc pro tunc* to July 11, 2022, and any other request for the Supplemental Representation is hereby deemed withdrawn.

2. In connection with the Preservation Services provided on July 11, 2022 and continuing through and including August 8, 2022, Quinn Emanuel is entitled pursuant to the Quinn Retention Order to charge the Estate its standard hourly rates, subject to a ten (10) percent discount, and same shall be included as such in any future fee application that may be filed by or on behalf of Quinn Emanuel. Approval of Quinn Emanuel's fees for the Preservation Services shall be subject to further order of the Court after appropriate notice and application which application may be filed on or after September 7, 2022.

3. Except as otherwise set forth herein, beginning on August 9, 2022, Quinn Emanuel shall no longer be compensated on an hourly basis for Preservation Services and any such services provided thereafter shall be in connection with the Contingency Fee delineated in the Quinn Retention Order as found in the engagement letter attached to the Quinn Retention Application (the "**Quinn Engagement Letter**"), except as clarified hereafter.<sup>3</sup> Specifically, of the amount received by the Estate at Closing, Quinn Emanuel shall be entitled to receive \$6,247,500, which represents 35% of the Total Settlement Payment less the Improvident Payment.<sup>4</sup> From the Second Defendants' Payment received by the Estate, Quinn Emanuel shall be entitled to receive 50% (\$1,575,000) of the total Improvident Payment (\$3,150,000)). From the Third Defendants'

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<sup>3</sup> Notwithstanding anything herein, this Order does not preclude Quinn Emanuel from also seeking approval of its fees and costs on an hourly basis for all time and expenses it incurred performing work related to the Supplemental Application that is not otherwise defined as Preservation Services. This request may include, but is not limited to, preparation and/or review of all pleadings related to the Supplemental Application, negotiations regarding the Supplemental Application, addressing or resolving any formal or informal objections to the Supplemental Application, and preparation for and/or attendance at any hearings conducted by the Court related to the Supplemental Application regardless of the date these services were provided by Quinn Emanuel.

<sup>4</sup> For clarification, pursuant to the Judicially Mediated Global Settlement, the Total Settlement Payment less the Improvident Payment is an amount of \$17,850,000.

Payment received by the Estate, Quinn Emanuel shall be entitled to receive the remaining 50% of the total Improvident Payment (\$1,575,000), less thirty-five percent of all Costs and Expenses (with “**Cost and Expenses**” being costs and expenses paid by the Estate (and/or by Quinn Emanuel on behalf of the Estate) pursuant to, and consistent with, those costs and expenses described and/or set forth in the Quinn Engagement Letter). Notwithstanding the foregoing or anything in the Quinn Engagement Letter to the contrary, any amounts paid to Cozen O’Connor shall not be included as Costs and Expenses. Amounts paid to Quinn Emanuel on an hourly basis (solely in connection with the Preservation Services), however, shall be included as Costs and Expenses to be deducted from the amounts due and owing to Quinn Emanuel from the Third Defendants’ Payment, as described herein. Should the Estate ultimately not receive at least \$17,850,000 from the Defendants pursuant to the Judicially Mediated Global Settlement and Quinn Emanuel receives more than 35% of the Net Amount (with “**Net Amount**” being the amount paid to the Estate by the Defendants less Costs and Expenses), Quinn Emanuel shall disgorge any amount it received in excess of 35% of the Net Amount.

4. As stated in the Quinn Retention Order at ¶ 8, Foley’s rights to seek compensation for its prior work are reserved pending further order of this Court. The payment of the amounts to Quinn Emanuel set forth in this Order shall not limit, preclude, or impact in any way Foley’s right to seek recovery from Quinn Emanuel by providing requisite notice of its fee application at the appropriate time. Moreover, nothing herein shall act as a bar for the Trustee, Quinn Emanuel, or the UST to oppose any request by Foley for fees related to this Supplemental Application or any other fees paid (or sought to be paid) to Foley either by Quinn Emanuel or the Estate during the pendency of this Case. Further, no rights regarding the apportionment of any professional fees

in this case, are waived by Foley, Quinn Emanuel, or the Trustee, and all rights are expressly reserved.

5. Unless specifically modified herein, the Quinn Retention Order remains in full force and effect.

6. This Court shall retain exclusive jurisdiction over this Order, as well as all matters related thereto.

Entered:

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UNITED STATES BANKRUPTCY JUDGE

I ask for this:

/s/ Paula S. Beran

Paula S. Beran, Esquire (VSB No. 34679)  
Tavener & Beran, PLC  
20 North 8<sup>th</sup> Street, Second Floor  
Richmond, Virginia 23219  
Telephone: (804) 783-8300  
Facsimile: (804) 783-0178

*Counsel for Lynn L. Tavener, Chapter 7 Trustee*

Seen and not objected to:

/s/ Kathryn R. Montgomery

Kathryn R. Montgomery, Esquire  
Shannon F. Pecoraro, Esquire  
Office of the United States Trustee  
701 East Broad Street, Suite 4304  
Richmond, Virginia 23219  
(804) 771-8004

*Office of the United States Trustee*

**CERTIFICATION**

I hereby certify under Local Rule 9022-1 that the foregoing proposed Order was served on all requisite parties and has been endorsed by all necessary parties.

/s/  
Paula S. Beran, Esquire